

ESTTA Tracking number: **ESTTA283936**

Filing date: **05/14/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92049676
Party	Plaintiff Paramount Bed Company, Limited
Correspondence Address	Abigail Rubinstein Darby & Darby PC 250 Greenwich Street, 7 World Trade Center New York, NY 10007-0042 UNITED STATES tmdocket@darbylaw.com, abenjamin@darbylaw.com, ssaxon@darbylaw.com
Submission	Stipulated/Consent Motion to Extend
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Signature	/Abigail Rubinstein/
Date	05/14/2009
Attachments	Motion on Consent to Extend Time to Oppose Mot for SJ 14May09.PDF ( 3 pages )(17548 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Trademark Cancellation No. 92049676  
For the mark PARAMOUNT  
Registration No. 1,542,562

-----X		
PARAMOUNT BED	:	
COMPANY, LIMITED,	:	
	:	
Petitioner,	:	
	:	Cancellation No. 92049676
v.	:	
	:	
DREAMWELL, LTD.,	:	
	:	
Registrant.	:	
-----X		

**MOTION ON CONSENT TO EXTEND TIME TO FILE BRIEF  
IN OPPOSITION TO REGISTRANT'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to T.B.M.P § 509 the parties hereby consent and move for a thirty (30) day extension of time from May 15, 2009 up and until June 15, 2009 for Petitioner to file its Brief in Opposition to Registrant's Motion for Summary Judgment.

The motion is made not for the purposes of delay and good cause exists for this extension. Specifically, Petitioner is a Japanese company and has been unavailable until recently to instruct its counsel due to a National holiday in Japan. Additionally, Petitioner, after agreeing to an extension of time, just recently received Registrant's responses to Petitioner's discovery requests on Monday, May 11, 2009 and such responses were needed in order to prepare the Opposition Brief. Accordingly, good cause exists to grant this extension.

Counsel for Registrant consented to this motion in email dated May 12, 2009.

Respectfully submitted,

DARBY & DARBY, P.C.

A handwritten signature in blue ink, appearing to be 'PF', is positioned above a horizontal line.

Dated: May 14, 2009

By:

Paul Fields, Esq.  
Abigail Rubinstein, Esq.,  
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v.	:	
	:	
DREAMWELL, LTD.,	:	
	:	
Registrant.	:	
-----X		

**CERTIFICATE OF SERVICE**

This is to certify that a true copy of the foregoing document entitled MOTION ON CONSENT TO EXTEND TIME TO FILE BRIEF IN OPPOSITION TO REGISTRANT'S MOTION FOR SUMMARY JUDGEMENT was served on Registrant/Counter-Petitioner's via email and by first-class mail, postage prepaid on:

W. Andrew McNeil  
Morris, Manning & Martin, LLP  
1600 Atlanta Financial Center  
3343 Peachtree Road, NE  
Atlanta, Georgia 30326

on this day of May 14, 2009

/s/Annette P. McGuire